

Leif R. Sigmond  
215 Comanche Drive  
Oceanport, N.J. 07757  
201-229-9510

February 6, 1984

Honorable Reginald Stanton, J.S.C.  
Superior Court of New Jersey  
Morris County Courthouse  
Morristown, N.J. 07960

Re: State of New Jersey, Department of Environmental  
Protection vs. Scientific Chemical Processing, Inc.  
Docket Number: C-1850-83E

Dear Judge Stanton:

Enclosed please find copy of Certification In Response to  
Notice of Motion of the Plaintiff.

By copy of this letter, I am serving the parties noted herein  
below.

Respectfully yours,

*Leif R. Sigmond*  
Leif R. Sigmond

Enclosure

cc: Irwin I. Kimmelman  
Attn: David W. Reger, DAG  
Superior Court of New Jersey  
Harriet Sims Harvey, Esq.  
Edward J. Egan, Esq.  
Dominick Presto, Esq.  
Mr. Herbert G. Case

345794



Leif R. Sigmond, Pro Se  
215 Comanche Drive  
Oceanport, New Jersey 07757  
201-229-9510

SUPERIOR COURT OF NEW JERSEY  
CHANCERY DIVISION  
ESSEX COUNTY  
DOCKET NO. C-1852-83E

STATE OF NEW JERSEY, DEPARTMENT  
OF ENVIRONMENTAL PROTECTION,

Plaintiffs,

Civil Action

vs.

CERTIFICATION

SCIENTIFIC CHEMICAL PROCESSING,  
INC., a Corporation et al.,

Defendants

I, Leif R. Sigmond, of full age, do hereby certify  
as follows:

1. As stipulated, I signed a contract as a partner  
in Sigmond & Presto with S & W for the cleanup of the Newark  
site.

2. The status of the above cleanup has been outlined  
in Dominick Presto's Certification of February 3, 1984.

3. I do not understand why the D.E.P. would want  
personnel associated with SCP to execute manifests necessary  
to transport waste from SCP Carlstadt site to its ultimate  
disposal facility.

4. Certification of Hazardous Waste Manifests as  
I understand them, requires that the shipper certifies for a  
particular shipment:

- (a) That the materials are properly classified,  
described, packaged, marked and labelled;
- (b) That the materials are in proper condition  
for transportation according to the applicable

regulations of the Department of Transportation,  
U.S. EPA and the state;

(c) That the wastes in the shipment were consigned  
to the transporter named;

(d) That the Treatment, Storage or Disposal Facility  
can and will accept the shipment of hazardous  
wastes and has a valid permit to do so.

5. All of the above can obviously only be certified to  
by someone who is actually present at the site or member of  
an organization who controls the personell present at the site  
actually performing the functions outlined. In addition an up  
to date knowledge of laws, regulations and what is considered  
"proper" is also required. Finally, a knowledge of the waste  
disposal business and in particular the qualifications of the  
ultimate disposal facility is required.

6. S & W, Inmar and DEP are the only organizations  
involved in the Carlstadt cleanup meeting the above requirements  
to properly certify manifests as required by the State of New  
Jersey.

7. To require me, personally, to certify these mani-  
fests would be making a mockery out of the manifest system for  
the following reasons:

(a) I, as an individual, have no control or know-  
ledge as to the items required to certify as  
outlined in paragraph 4 above.

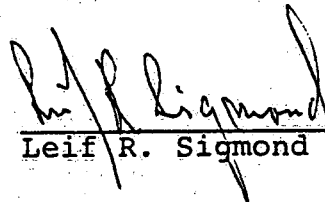
(b) As an individual, I do not have the means nor  
the facilities to do the testing required  
nor would I be able to comply with the require-

ments for record-keeping, reports, etc. required when certifying and administering a manifest system.

- (c) As a result of the Honorable Robert N. Wilenz order "that appellants immediately cease all solid waste disposal operations, including the handling of special waste" etc plus the criminal indictment for violating environmental statutes, and since the State of New Jersey obviously did not want me in the recovery and waste disposal business, I decided in 1980 to get out.
- (d) I do not have up to date knowledge of the laws, regulations or what is considered proper to properly handle waste. Neither do I have any knowledge of the Treatment, Storage and Disposal Facilities available.
- (e) I do not personally have knowledge of the existing inventory at Carlstadt. As a matter of fact, even when I was still an employee of SCP during the last three years 1977-1980, I only visited briefly on the average once per month the Carstadt facility.

8. I do not feel that I can properly execute manifests under the present circumstances.

Dated: February 6, 1984

  
Leif R. Sigmond